



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

**MEMO ENDORSED**

February 23, 2010

**BY HAND DELIVERY**

Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY
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Re: United States v. Thomas T. Prousalis, Jr., S1 03 Cr. 1509 (DLC)

Dear Judge Cote:

There is a hearing scheduled on February 26, 2010, at 12:00pm, on violations of supervised release filed against the defendant, Thomas Prousalis. The Government intends to call Probation Officer Elissa Martins as a witness and needs to collect and produce 3500 material to defense counsel in advance of the hearing, including Officer Martins' chronological notes maintained in the course of supervising Prousalis. The Probation Department advised me that it could not release these notes without an order from the Court. Accordingly, the Government respectfully requests that the Court order the Probation Department to release Officer Martins' chronological notes on Prousalis's supervision, so that I can review them and produce any 3500 material to defense counsel.

*So ordered.*

*Denise Cote*  
*Feb. 23, 2010*

Respectfully submitted,

PREET BHARARA  
United States Attorney

By: /s/ Seetha Rarnachandran *Seetha*  
Seetha Ramachandran  
Assistant United States Attorney  
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cc: Edward Kratt, Esq. (By email)  
Probation Officer Elissa Martins, EDVA (By email)  
Probation Officer Margaret Carroll, SDNY (By email)

COPIES SENT TO

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U.S. Probation Department  
Attn: Margaret A. Carroll